

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-99-047 (Rev1)

UNIVERSAL FASTENERS, INC.

LAWRENCEBURG, KY.

DOROTHY NGUYEN, REVIEWER

Plant I.D. # 21-005-00006

Application Log # 54431

SOURCE DESCRIPTION:

Universal Fasteners fabricates metal fasteners such as might be found on denim jeans and jackets. This includes buttons, and snaps, but not zippers. The fasteners are stamped from sheet metal of various types, with an embossed logo representing the customer's clothing name. These fasteners are cleaned, deburred, polished, chromated or electroplated, then a decorative paint is applied in one of several types of machines.

COMMENTS:

Universal Fasteners is proposed to add two addition processes that are Automatic Spray Process and Four Tumble Spray Machines.

The sludge dryer (EIS # 15) and Zinc Plating Line (EIS #06) are removed from the facility

The electrostatic painter (EIS # 11) has a panel filter for control of particulate. Efficiency is 95%.

Each plating line is controlled by one or more scrubbers. Efficiency of PM control is 90%.

There is no control equipment for the Barrett Dip/Spin Pain Machine.

All emission factors were provided by the consultants, Kenvirons; and AP-42.

Applicable regulations:

401 KAR 59:010 applies to PM generated by the above listed facilities.

401 KAR 63:060 applies to HAPs emitted at all affected facilities.

401 KAR 61:015 applies to the boilers, E.P. 10.

EMISSION AND OPERATING CAPS DESCRIPTION

UFI is major for HAPs and VOC emissions. The source wishes to put limit on the VOC emissions to less than 90.0 tons per year, so they would not be subject to 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations as a major source. The permit will require recordkeeping to show VOC emissions.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.